

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
ST. LOUIS DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	4:23-CR-00578-AGF-1
)	
CONNIE BOBO)	

**UNOPPOSED MOTION TO CONTINUE TRIAL
AND ALL ASSOCIATED DEADLINES AND HEARINGS**

Ms. CONNIE BOBO, pursuant to 18 U.S.C. § 3161(h), respectfully moves this Court to continue the trial set for January 21, 2025, and all associated deadlines and hearings for no less than ninety days.

I. Relevant Procedural History

On October 25, 2023, a grand jury indicted Ms. Bobo of three counts of wire fraud in violation of 18 U.S.C. § 1343 (Counts One to Three); three counts of aggravated identity theft in violation of 18 U.S.C. § 1028(A) (Counts Four to Six); and two counts of obstructing an official proceeding in violation of 18 U.S.C. § 1512(c)(1) (Counts Seven and Eight). (Indict., ECF No. 2.) On August 14, 2024, this Court set trial for January 21, 2025. (Order, ECF No. 52.) On October 22, 2024, undersigned counsel entered *pro hac vice* to represent Ms. Bobo. (Order, ECF No. 69.)

II. Factual Assertions

Ms. Bobo respectfully submits that undersigned counsel is in the process of reviewing discovery and remains hopeful of a pretrial resolution. To that end, the parties have engaged in specific resolution efforts but require additional time for said efforts to come to fruition. For these reasons, Ms. Bobo respectfully moves this Court to continue the trial and all associated deadlines and hearings for ninety days.

III. Memorandum of Law and Argument

The Speedy Trial Act, 18 U.S.C. § 3161(h), excludes from the computation time in which a trial must commence “[a]ny period of delay resulting from a continuance ... at the request of the defendant ... if the judge granted such continuance on the basis ... that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.” 18 U.S.C. § 3161(h)(7)(A). A court, in its determination whether to grant a continuance and exclude any resulting period of delay from the Act’s computation of time, must consider, *inter alia*, whether its denial of the continuance will result in a “miscarriage of justice” (18 U.S.C. § 3161(h)(7)(B) (i)) or deny a party “the exercise of due diligence” (18 U.S.C. § 3161(h)(7)(B)(iv)).

Undersigned counsel submits that this motion is made in good faith and without intent to cause inconvenience to any party. Ms. Bobo respectfully submits, pursuant to 18 U.S.C. § 3161(h)(7)(A), for the reasons stated above, that the ends of justice served by the Court's granting this motion outweigh the interest of the public and herself in a speedy trial. *See Bloate v. United States*, 559 U.S. 196 (2010).

IV. Opposing Party's Position

The Government does not oppose this request.

V. Conclusion

Based on the foregoing assertions and argument, Ms. Bobo prays that this Court continues the trial and all associated deadlines and hearings for no less than ninety days.

Date: December 4, 2024

Respectfully submitted,

s/Murdoch Walker II

Murdoch Walker II, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2024, I electronically filed the foregoing UNOPPOSED MOTION TO CONTINUE TRIAL AND ALL ASSOCIATED DEADLINES with the Clerk of the United States District Court for the Eastern District of Missouri by way of the CM/ECF system, which automatically will generate a notice of electronic filing and serve this document on the attorneys of record for the parties in this case by electronic mail.

Date: December 4, 2024

Respectfully Submitted,

s/Murdoch Walker II
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